

The Honorable Jessica G. L. Clarke
United States District Court Judge
Southern District of New York
500 Pearl Street
New York NY, 10007

Re: Rapaport v. Finkelman, 24-cv-05942

Letter-Motion for Expedited Discovery Relating to Defendant Finkelman's Motion for Sanctions

Your Honor:

I am respectfully writing to request that you grant me expedited discovery as is necessary to defend against the motion for sanctions brought against me by Mr. Max Rodriguez on behalf of defendant Finkelman.

I lack key information that would be necessary for me to evaluate the facts alleged and declared by Mr. Rodriguez and defend myself against his allegations of wrongdoing, including as to the communications he had with my former counsel, Mr. Richard Altman, and his motives. Mr. Rodriguez has supported his motion for sanctions upon declarations pertaining to phone calls and other communications he had with my former counsel which I was not a party to and have no knowledge of. ECF. No. 21 and 21-2 at 11.

Specifically, I require subpoenas duces tecum as to all communications or records of communications (including letters, emails, phone call recordings, transcripts and call logs) between Mr. Rodriguez and Mr. Altman, and subpoenas ad testificandum to compel their sworn testimony in depositions as to their personal knowledge, mental impressions and other relevant matters, particularly for ascertaining intent, to defendant Finkelman's motion for sanctions against me.

Thank you for considering my request in this matter,

Respectfully submitted,

/s/ Gideon Rapaport *pro se*
GideonRapaportLaw@outlook.com
(862) 213-0895
#627 1078 Summit Avenue
Jersey City, New Jersey, 07307